

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

In re UPSTREAM ADDICKS AND
BARKER (TEXAS) FLOOD-CONTROL
RESERVOIRS

Sub-Master Docket No. 1:17-9001L
Judge Charles F. Lettow

THIS DOCUMENT RELATES TO:

ALL UPSTREAM CASES

UPSTREAM CO-LEAD COUNSEL'S PROPOSED SCHEDULE

Upstream Co-Lead Counsel respectfully propose the following schedule with the goal of completing the compensation phase trial for the six test properties before the holidays. This schedule allows for reasonable time for exchange of expert reports in light of the time the experts have already been working on this matter (*e.g.* Government appraisal experts visited the test properties in May 2020), and eliminates unnecessary delays before starting the Appendix A process.

Event	Deadline
Plaintiffs' deadline to seek <i>in camera</i> review of redacted documents	Tuesday, March 30, 2021
Rule 26(a)(2) Disclosures	Friday, April 2, 2021
Close of Fact Discovery	Monday, April 26, 2021
Plaintiffs serve Expert Reports	Friday, May 28, 2021
Defendant serves Expert Reports	Monday, June 28, 2021
Plaintiffs serve Expert rebuttal reports	Monday, August 16, 2021
Close of Expert Discovery	Friday, August 27, 2021
Meeting of Counsel pursuant to App. A, ¶ 13	Friday, August 27, 2021
Meeting of Counsel Certification	Friday, September 3, 2021
Plaintiffs' Pre-Trial Memorandum, Exhibit List, and Witness List, pursuant to RCFC App. A, ¶¶ 14(a), 15, and 16	Friday, September 10, 2021
Defendant's Pre-Trial Memorandum, Exhibit List, and Witness List pursuant to RCFC App. A, ¶¶ 14(b), 15, and 16	Friday, October 8, 2021
Pre-Trial Conference at 515 Rusk St. Houston, Texas	Friday, October 29, 2021
Trial on Compensation Phase at 515 Rusk St. Houston, Texas	November 1-5, 8-9 (7 day trial)

Respectfully submitted,

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Of Counsel

Certificate of Service

The undersigned attorney hereby certified that a true and correct copy of the foregoing instrument, together with all exhibits, was served on all counsel of record in this Sub-Master Cause by filing it via the Court's ECF system on March 11, 2021.

/s/Edwin Armistead Easterby